On June 15, 1989 Christopher Johnson, Kenneth Smith, and Alfonso Berumen conducted a follow-up inspection of Diversey Wyandotte Corporation (Diversey) located at 8921 Dice Road in Santa Fe Springs, California. The purpose of the visit was to assess the progress that Diversey had made toward compliance with the May 12, 1989 Official Notice of Violation issued by our Department and to obtain samples of hazardous wastes which were still being handled, stored, and disposed of improperly. Mr. Johnson, Mr. Smith, and Mr. Berumen arrived at Diversey at approximately 10:00 a.m. and met Richard Galle, the plant manager at the Santa Fe Springs address. Mr. Johnson informed Mr. Galle of the purpose of the visit. Mr. Galle escorted us to the southeastern part of the yard where the water treatment system is located. Mr. Johnson, Mr. Smith, and Mr. Berumen observed a trench running from the south fence line to the sump. The trench appeared to have been formed by the gradual etching of materials through the pavement (refer to map area III). The etching was significant in certain areas and it was impossible to visibly determine if the paved containment had been sufficient enough to prevent the materials from leaking through to the soil. Mr. Galle stated that these materials were pumped from the ground into the treatment sump on a regular basis, however this was not varifiable at the time of the inspection.

Mr. Galle expland that he had moved the ardous waste containers to the southeast corner of the yard to separate them from the material containers. Mr. Johnson, Mr. Smith, and Mr. Berumen observed approximately threehungred (300) 55-gallon drums of waste next to the water treatment area (refer to map area I), 36 drums of waste just northwest of this area near the above ground bermed storage tank area (refer to map area V). Mr. Galle then escorted us to the above ground tank area which is located against the south wall of the main production facility. At the southeast corner of this tank area, Mr. Smith observed a drain which appeared to be unlined. Mr. Galle stated that he did not know the status of the drains lining or where it led. Mr. Smith and Mr. Johnson observed a large quantity of potassium hydroxide (solid) (KOH) on the ground which had apparently leaked out of a storage tank labeled KOH. Mr. Smith also observed a large amount of coal oil on the ground (paved), both inside and outside of the bermed area, which Mr. Galle stated had come from a broken line running from the tank to the production area (refer to map area VI). Mr. Smith asked Mr. Galle why the two spills had not been cleaned up and what the current company policy was for addressing these situations. Mr. Galle stated that his company was working to clean up the spills and that it is company policy to address such spills in a timely manner.

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At the time of inspection, Thorne Envi mental, the contractor Diversey had hired to assess the ground contamination, was on-site with GLX, their drilling subcontractor.

The two companies were actively taking soil samples in the area around the above ground tank storage area at the time of the inspection (refer to map Area I). After being introduced to Richard F. Reimers, the project Geologist for Thorne Environmental, Mr. Smith asked him why the company had started work without supplying the Department with a site assessment workplan. Mr. Reimers stated that he was not aware of the requirements for a site assessment workplan. He stated that he would call his office and have a plan sent out as soon as possible. Mr. Smith then asked Mr. Reimers what type of assessment was being conducted. Mr. Reimers stated that soil borings would be taken at depths ranging from 61/2 to 25 feet. Samples would be collected a 2ft. or 5ft. intervals depending on the depth of the boring. He stated that monitoring wells would not be installed unless the contamination was found to extend down to groundwater depths.

\*Note that there are two separate above ground tank storage areas. The area containing the leaking kerosine based oil tank is south of the tank storage area containing the potassium hydroxide and coal oil tanks.

Mr. Galle then escorted us to the area just west of the above ground ignitable liquid storage tank area.

Mr. Johnson, Mr. mith and Mr. Berumen observed approximately 300 more 55-gallon drums of hazardous waste (refer to map Area VII). We asked Mr. Galle how many of the remaining drums located to the west and north of this area were also hazardous wastes. Mr. Galle stated that he believed that all containers west of the 300 we had just observed were new materials or materials to be reworked. Within the 300 drums Mr. Smith, Mr. Johnson, and Mr. Berumen observed open leaking and improperly labeled containers. When asked, Mr. Galle stated that he was not aware of the open or leaking containers. Mr. Smith then asked Mr. Galle whose responsiblity it was to manage the drum storage area. Mr. Galle stated that it is the plant manager's responsibility to oversee the yard and that the plant manager before himself was Larry Miller. Mr. Galle stated that Mr. Miller had not attended to the yard. We then continued west along the south side of the yard and Mr. Smith asked Mr. Galle questions about the drums being stored there. Mr. Galle could not answer the questions relating to shelf life and rework practices. Mr. Smith then asked Mr. Galle who could answer these questions. Mr. Galle stated that he would go into the production area and find someone for us to talk to. Mr. Galle returned and introduced us to Terry Telles. Mr. Telles stated that his official title is packer, but that he has been working to organize the yard. Mr. Smith asked Mr. Telles what the common procedure was for handling rework materials was.

Mr. Telles state that the current company actice is to add rework materials to the next batch after a sample of the materials is tested by the lab and authorized by a supervisor. Mr. Smith asked Mr. Telles about the drums located west of those identified as waste by Mr. Galle. Mr. Telles pointed at 106 drums (not labeled in accordance with Title 26) located in the middle of the rework drum area and another 36 drums located in the south west corner of the yard. Mr. Telles stated that the 36 drums of waste (not labeled in accrodance with Title 26) had been acquired and hauled as product materials by Diversey even though it was classified as a waste by the Far Best Co., to the Santa Fe Springs location from a Far Best Inc. chemical manufacturing plant located in the East Los Angeles area which was acquired by Diversey in 1987. Mr. Telles stated that the company could not use the material and therefore it was waste. Mr. Smith asked Mr. Telles how often the materials in the yard were inventoried. Mr. Telles stated that the company conducts an inventory once every 2-3 years. Mr. Galle then escorted us along the west side of the yard. Mr. Johnson, Mr. Smith and Mr. Berumen observed a pile of 55 kg bags of detergent labeled F101 or F102 detergent. Some of these bags were open and there was a significant amount of the white solid detergent on the ground. The bags were labeled corrosive.

Mr. Johnson as about the materials and Telles stated that it was scrap detergent which could no longer be used.

Mr. Johnson asked if it was a hazardous waste, Mr. Galle stated that it was. Mr. Smith asked what was normally done to locate and address such spills. Mr. Telles stated that normally someone finds the spill and then everybody pitches in to help clean it up. During our presence in the yard (approximately 4 1/2 hours) no attempt was made by employees of Diversey Wyandotte to pick up any spilled hazardous waste. Just north of the detergent area Mr. Johnson, Mr. Smith, and Mr. Berumen observed eight more rows of pallets containing what appeared to be old materials. Mr. Johnson inquired about the drums and Mr. Galle stated that they were more drums which had been transferred to their Santa Fe Springs plant from Far Best. Mr. Johnson asked Mr. Galle if Diversey could still use these materials. Mr. Galle stated that most of the materials could not be used and were therefore a waste. The wastes included powdered chlorine (in open 55-gallon drums), chlorinated detergents, sodium bifluoride, nickel carbonate, ferric nitrate in a badly deteriorated drum which allowed the material to escape to the ground, and a variety of other wastes including solvents, oxidizers, and corrosives. None of the containers observed which ranged from 5-10 gallons, were labeled as hazardous waste. None of the containers observed had accumulation dates.

Many of the was observed were stored wi out regard for compatibility (i.e. Ferric nitrate with methanol). Mr. Johnson then asked just how much material had actually been transported form Far Best at the time of purchase. Mr. Telles stated that 15 (18 wheel) trucks filled with containers had been transferred form Far Best to Diversey. Inside the warehouse we witnessed numerous cases of incompatible storage and broken or leaking containers (citric acid). An example of incompatible storage in the warehouse was the storage of food grade chemical (citric acid) with non-food grade chemical (sodium Hypochlorite). Mr. Galle then escorted us through the warehouse storage area on the west side of the yard. Upon completing our walk through inspection we returned to the east yard where Mr. Berumen, with the assistance of Mr. Johnson, proceeded to obtain samples of 3 different wastes. Sample number one was of a brownish-red solid taken from an open and badly deteriated brown drum labeled ferric nitrate. A field test of the was indicated a ph 0-2. Sample number two was of a white solid from the ground (below bags labeled Detergent F101 or F102). A field test of the waste indicated a pH of 13-14. Sample number three was a composite of some discolored spill located near the north east corner of the yard, (six total samples were taken). All samples were sealed with parafilm and evidence tape. Photographs of the samples and sampling locations were taken and all the proper documentation was completed.

Mr. Galle recei 3 split samples for Diverey Wyandotte. We then went to Mr. Galle's office and discussed the findings of our inspection. Mr. Smith and Mr. Johnson informed Mr. Galle of the violations which were still present on-site and pointed out the fact that the company had not met many of the compliances dates given on the Official Notice of Violation issued May 12, 1989. Specifically, the company had not labeled, or stored their waste drums properly nor had the company met the May 30, 1989, deadline for cleaning up all wastes which had been discharged to the ground. Mr. Galle was advised that a letter would be sent out lining the additional violation observed and added correction periods. Following the closing conference, we departed the facility at 2:30 p.m..